

**LEMON GROVE SANITATION DISTRICT
AGENDA ITEM SUMMARY**

Item No. 5
Mtg. Date October 18, 2016
Dept. Public Works

Item Title: **Metro Wastewater Update**

Staff Contact: Mike James, Assistant City Manager / Public Works Director

Recommendation:

Receive the report and provide direction to the District's representative to the Metro Wastewater Commission to represent the District Board's interest at upcoming public meetings.

Item Summary:

At the request of Boardmember Jerry Jones, the District's representative that serves on the Metro Wastewater Commission/Joint Powers Authority (Commission/JPA), staff prepared a report (**Attachment A**) detailing recent activities occurring with the Metro Commission.

After receiving the report, staff recommends that the District Board provide direction to Boardmember Jones to represent the District Board's interest at upcoming public meetings. | |

Fiscal Impact:

None.

Environmental Review:

☒ Not subject to review

☐ Negative Declaration

☐ Categorical Exemption, Section | |

☐ Mitigated Negative Declaration

Public Information:

☒ None

☐ Newsletter article

☐ Notice to property owners within 300 ft.

☐ Notice published in local newspaper

☐ Neighborhood meeting

Attachments:

A. Staff Report

LEMON GROVE SANITATION DISTRICT STAFF REPORT

Item No. 5

Mtg. Date August 16, 2016

Item Title: **Metro Wastewater Update**

Staff Contact: Mike James, Assistant City Manager / Public Works Director

Background:

In 1972, the Federal Water Pollution Control Act Amendments of 1972 (Clean Water Act or CWA) was enacted as the primary federal law in the United States that governs water pollution. Its objective is to restore and maintain the chemical, physical, and biological integrity of the nation's waters by preventing point and nonpoint pollution sources, providing assistance to publicly owned treatment works for the improvement of wastewater treatment and maintaining the integrity of wetlands.

The CWA introduced the National Pollutant Discharge Elimination System (NPDES), which is a permit system for regulating point sources of pollution. Point sources include:

- Industrial facilities including manufacturing, mining, oil and gas extractions, and services industries; and
- Municipal governments and other government facilities such as military bases; and
- Some agricultural facilities such as animal feedlots.

Point sources may not discharge pollutants to surface waters without a permit from the NPDES, which is managed by the EPA in partnership with state environmental agencies. The EPA has authorized 46 states to issue permits directly to the discharging facilities. Since 1973, California was identified as one of those states.

The CWA and EPA have a direct impact to the Lemon Grove Sanitation District (District) because the District is a member of the Metro Wastewater Commission and all wastewater generated in the District is transported and treated at the Point Loma Wastewater Treatment Plant (Point Loma). Point Loma, which opened in 1963, treats approximately 175 million gallons of wastewater per day, of which the District is approximately 1.2%, generated in a 450 square mile area by more than 2.2 million residents. It has a treatment capacity of 240 million gallons per day (mgd) and is considered a point source outflow of treated wastewater into the Pacific Ocean and falls within the NPDES permit system.

Provisions in the law have allowed the City of San Diego (the City) to avoid upgrades to secondary treatment by showing that the advanced primary treatment process at Point Loma is doing no harm to the ocean. While scientific experts have confirmed that no harm is being done, each permit application has been challenged by the environmental community that has favored secondary upgrades. Among other things, requirements for extensive ocean monitoring and water recycling have come out of those challenges.

Advanced Primary treatment at Point Loma comes extremely close to the legal requirements. Those legal requirements are measured in parts per million, percentages, with discharge volumes no greater than 240 million gallons a day. The current permit application proposes to duplicate the mass emissions that would be discharged by a full secondary plant at the currently

Attachment A

permitted volumes of 240 mgd. This is called secondary equivalency and is proposed to be achieved by diverting wastewater flows to produce 83 mgd of purified potable water at other plants. That program is called Pure Water San Diego Program (Pure Water) and will lower the discharge limit at Point Loma from 240 mgd to less than 160 mgd.

Currently, the modified permit for Point Loma expired on July 31, 2015. The City submitted a renewal application in January 2015 and the existing Modified Permit has been administratively continued pending a decision by the regulatory agencies. The City anticipates that it will receive approval of a new Modified Permit by the end of the first quarter of 2017. If the City does not receive a renewal of the Modified Permit, the implementation of secondary treatment would be required at Point Loma. In Fiscal Year 2014 / 2015, the cost was estimated at \$2.1 billion.

The basis of the Point Loma Permit Application was originally outlined with the following tasks and deadlines as shown in the table below:

Task	Date (Not later than)
Environmental Review	
Issue Notice of Preparation for Program EIR	January 31, 2015
Public Draft Program EIR for Public Review	March 31, 2017
Certify Final Program EIR	October 31, 2019
North City Projects	
NTP – Final Design of 15 mgd pipeline from NCWRP to San Vicente Reservoir	January 31, 2017
NTP – Final Design of 15 mgd NCWRP Potable Reuse	May 31, 2017
Complete Design of 15 mgd pipeline from NCWRP to San Vicente Reservoir	October 31, 2019
Complete Design of 15 mgd NCWRP Potable Reuse	January 31, 2020
Goals, subject to approval of Secondary Equivalency Legislation	
Produce at least 15 mgd of potable reuse	December 31, 2023
Produce at least 30 mgd of potable reuse (Cumulative Total)	December 31, 2027
Produce at least 83 mgd of potable reuse (Cumulative Total)	December 31, 2035

Discussion:

At the request of Boardmember Jones, staff prepared this report to summarize the history of the permitting process. Additionally, there are a number of topics that are related to the Modified Permit which may impact the District's finances moving forward. Those topics include:

- Activities in the Modified Permit versus Activities that are currently underway.
- Perception that the City is rushing the Pure Water design/construction timelines.
- Financial impacts to the District Board.

Attachment A

After receiving the report, staff requests that the District Board provide direction to Boardmember Jones regarding the following items at City of San Diego or the Metro Commission/JPA future meetings as they related to the District's operations:

1. Work towards an agreement with the participating agencies (PA) and the City to share costs of Pure Water after secondary equivalency becomes law.
2. Work on and formalize an agreement between the City and the PA's for cost sharing of wastewater expenditures and revenue sharing of recycled water products.
3. Develop and agree on a long term financial plan between the PA's and the City.
4. Modify/Update the wastewater agreement to properly reflect the current/future activities that result from the water and wastewater cost sharing relationship.
5. Oppose the design and construction of future capital improvement projects that support any project other than what is currently listed in the Modified Permit.

Conclusion:

Staff recommends that the District Board:

1. Receives the report, and
2. Directs the Metro Commission Representative to represent the District's interest in upcoming Metro Commission or City of San Diego City Council meetings.